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May 17, 2004

To: FCC
CC: ARRL, Senators Boxer and Feinstein, Congressman Stark

Re: Broadband over Power Lines (BPL)

Greetings,

I have been involved in many technical and public service aspects of Ham radio for more than 35 years. I was the project director of a million-dollar Emergency Medical Services development project of which a central feature was the implementation of a complex 911, hospital, ambulance, police and fire communications system.

In my experience it has an ominous import when a governmental regulatory agency fails to respond directly to the statements or concerns of a regulated organization, or appears evasive or gives a trick answer.

In this connection I have perceived the statement of Chairman Powell to be oddly evasive. Both in print and on TV I believed I heard the Chairman say that although it might potentially provide an important benefit, the FCC would not allow BPL to interfere with established, "essential" communications services. Whatever the exact word he used, his response seemed carefully crafted to include that qualifier, as if to permit some later decision to permit interference on the basis, perhaps, that the service interfered with was "inessential", less important, or unimportant than BPL to the community.

As others have indicated, it is clear that BPL will cause significant interference, to varying degrees, to Amateur Radio communications.

I can foresee an argument being made that amateur radio services are "essential" only in times of crisis or emergency in the community, and that BPL will usually interfere with ham communications only in terms of "ordinary", mundane and inessential, daily use. Such an argument would be exceedingly short-sighted and ill advised.

If the FCC does take that line of reasoning I wish to point out the following truth about "essential" emergency communications: Based upon my experience and the many wise

and experienced senior Civil Defense and communications planners who taught me, the best and often only reliable way to have a system that works in an emergency is to have it working every day, so that it remains only to switch to "emergency" mode at the required moment.

Anything which degrades amateur use of the amateur bands on a daily basis will therefore inevitably interfere with the efficacy of ham communications during times of fire, tornado, earthquake, flood or terrorist sabotage.

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